Norris A. Adams, II Robert S. Blair, Jr. † Jonathan E. Buchan, Jr. Edward G. Connette Heather W. Culp John T. Daniel



Richard A. Elkins Lauren V. Lewis † Stephen H. Morris Natalie D. Potter* Caitlin H. Walton

Retired Kenneth F. Essex Channing O. Richards

npotter@essexrichards.com Direct dial: 704-285-1111

* Also admitted in MD † NC Board Certified Specialist in Family Law

August 10, 2018

Mark W. Ishman Ishman Law Firm, P.C. 9660 Falls of Neuse Road Suite 138-350 Raleigh, NC 27615 Via U.S. Regular Mail and Email to: mishman@ishmanlaw.com

Re:

Baronius Press, Ltd. V. Saint Benedict Press, LLC

3:16 cv-00695-GCM (USDC - WDNC)

Dear Mark:

Enclosed are Saint Benedict's updated sales figures broken down by month, as well as by hardcover and paperback as you have requested, bates stamped SBPP-03393 to SBPP-03394 and marked Confidential. As you can see, the sales information dates back to 2008. Although we do not believe that Baronius is entitled to sales or profit information going back that far, nor do we believe that, should Saint Benedict be found to have infringed your client could recover any damages from sales prior to 2014, we have nonetheless provided you with the enclosed as it further shows that our client has continuously exploited the Work and is therefore a reliance party. Although our client can explain the various columns and figures during its deposition, to assist you with providing us with your outstanding damages figures as expeditiously as possible, which we have repeatedly requested, I can tell you that "PB" stands for paperback and "HC" stands for hardcover. "Net units" and "net sales" only represents the total sales, or units sold, minus returns. The "net sales" figures do not take into account any of the expenses that our client is allowed to deduct by law.

As you now have the information you have requested and in the format you have requested it, we expect complete responses to Defendant Saint Benedict Press, LLC's Second Set of Interrogatories and Requests for Production of Documents to Plaintiff Baronius Press, Ltd. by close of business Wednesday, August 15, 2018.

Attorneys at Law | 1701 South Boulevard, Charlotte, North Carolina 28203 www.essexrichards.com | 704.377.4300 phone | 704.372.1357 fax Mr. Mark Ishman August 10, 2018 Page 2 of 2

I have received your email requesting a date to meet and confer regarding Defendant's privilege log. It would be more efficient to wait to have the conference until after we have received Plaintiff's complete responses to Defendant's Second Set of Discovery Requests so that any remaining deficiencies in your client's responses can be addressed at the same time.

Sincerelly

Jonathan E. Buchan Natalie D. Potter

NDP/hmb Enclosure

cc:

Kristin G. Garris (via email only to: garris@thsh.com)

Fundamentals NET Sales History

		YEAR			PBSKU 🖁
2			Last Care		
2008 MAS Mer					constitution and a superior and a su
2 2001					
2002					American Control Control (Control (
1					
7 1000 MAG					
2088 MAS					The state of the s
9 2008 MAS Gp					ana manna ana manarangan
19 2008 MAS Cot 0.155 2.256 2.25					THE STANDSON PRODUCTION OF THE STANDSON PRODUCTI
11 2088 MAS Nov 0165 2350 2350 1 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2					- Commonweathern
10 10 10 10 10 10 10 10					
15 2009 MAS					
14 2009 MAS		2000	INIAO	Dec	0100
15 2009 MAS		2000	МУС	lan	0155
16 2009 MAS					
17 2009 MAB AP					
MAS					
19 2009 MAS July 0155 2350 2350 236					
202 2000 MAS Aug 0165 2250 2250 2250 2250 2250 2250 2250 22					
2008 MAG					
22 2009 MAS					
223 2099 MAS New 0155 22390 2239					\$1000 meneral and replaced the second
MAS					
25 2009 MAS Dec 0155 2250					
MAS					
27 2010 MAS Jan 0155 2350 2320 2010 MAS APF 0155 2320 2010 MAS Jun 0155 2320 2010 MAS Jun 0155 2320 2010 MAS Jun 0155 2320 2010 MAS APF 0155 2011 MAS APF 0155 2320 2011 MAS APF 0155		2009	mA5	Dec	U100
20 2010 MAS Mar Peb 0155 2380 2380 2010 MAS Mary 0155 2380 2380 2010 MAS Mary 0155 2380 2380 2010 MAS Mary 0155 2380 2380 2011 MAS Mary 0155 2380 2380 2380 2380 2011 MAS Mary 0155 2380 2380 2380 2380 2380 2380 2380 2380		2040	MAG	lan	0455
201 0 10 MAS MAY 0155					2
2010 MAS					
2310					
2010 MAS Jul					
33 2010 MAS Aug 0155 2280 34 2010 MAS Aug 0155 2280 34 2010 MAS Aug 0155 2280 36 2010 MAS Cct 0155 2280 37 2010 MAS Cct 0155 2280 38 2011 MAS Aug 0155 2280 38 2011 MAS Feb 0155 2280 38 2011 MAS Aug 0155 2280 38 2011 MAS Aug 0155 2280 38 38 2011 MAS Aug 0155 2280 38 38 38 39 39 39 39 39					
34 2010 MAS Sep 0155 35 2010 MAS Sep 0155 36 2010 MAS Nov 0155 2380 37 2010 MAS Nov 0155 2380 39 41 2011 MAS Jan 0155 2280 41 2011 MAS Mar 0155 2280 42 2011 MAS Mar 0155 2280 42 2011 MAS Mar 0155 2280 42 2011 MAS May 0155 2280 42 2011 MAS Jul 0155 2280 46 2011 MAS Jul 0155 2280 48 2011 MAS Cct 0155 2280 49 2011 MAS Doc 0155 2280 51					
35 2010 MAS Sep 0155 2350 36 2010 MAS Nov 0155 2350 37 2010 MAS Nov 0155 2350 38 2010 MAS Nov 0155 2350 38 2010 MAS Dec 0155 2350 38 2010 MAS Jan 0155 2350 38 2011 MAS Jan 0155 2350 38 2011 MAS Jan 0155 2350 38 2011 MAS Mar 0155 2350 38 2011 MAS Apr 0155 2350 38 2011 MAS Apr 0155 2350 38 2011 MAS Apr 0155 38 2011 MAS Jan 0155 2350 38 2011 MAS Jan 0155 39 2011 MAS Apr 0155 39 2011 MAS Nov 0155 39 2012 MAS Mar 0155 39 2012 MAS Mary 0155 39 2					
36 2010 MAS					
37 2010 MAS					
38 2010 MAS Dec 0155					- Commonwealth Company (Company)
39					······································
40 2011 MAS		2010	MAS	Dec	0165
41 2011 MAS		0044	W.A	la-	0455
42 2011 MAS					
43 2011 MAS Apr 0165 2350					
44 2011 MAS					- Exception of the second second second
45 2011 MAS Jun 0155 2350 2350 2360					
46 2011					
47 2011					Entrance continues a content lister
48					
49 2011 MAS Oct 0155 2350 2350 2360 50 2011 MAS Nov 0156 2360 2350 50 2350 2350 50 2350 50 2350 50 2350 50 2350 50 2350 50 50 2350 50 2350 50 50 2012 MAS Aga 10 1055 50 2012 MAS Mar 0155 2350					
Solid Mas					
51 2011 MAS Dec 0156 2350 2350 2350 52 2350 53 2012 MAS Jan 0155 2350 2350 54 2012 MAS Mar 0155 2350 2350 55 2012 MAS Apr 0155 2350 2350 2350 56 22350 2350 56 22350 2350 56 22350 2350 56 22350 58 2012 MAS May 0155 2350 2350 58 2012 MAS Jul 0155 2350 2350 59 2012 MAS Aug 0155 2350 2350 60 2012 MAS Aug 0155 2350 2350 60 2012 MAS Nov 0155 2350 2350 60 2350 2350 60 2350 60 2350 60 2350 60 2350 60 2350 60 2350 60 2350	49	2011	MAS	Oct	0155
S2 S2 S2 S2 S2 S2 S2 S2					
53 2012 MAS Jan 0155 2350 2350 2350 54 2012 MAS Feb 0155 2350 2350 55 2012 MAS Apr 0155 2350 2350 2350 56 2012 MAS Apr 0155 2350 2350 2350 2350 57 2012 MAS Apr 0155 2350 <		2011	MAS	Dec	0155
54 2012 MAS Feb 0155 2350 2350 255 2012 MAS Mar 0155 2350 250 2550 <td></td> <td></td> <td></td> <td></td> <td></td>					
55 2012 MAS Mar 0155 2350 56 2012 MAS Apr 0155 2350 57 2012 MAS May 0155 2350 58 2012 MAS Jun 0155 2350 59 2012 MAS Jul 0165 2350 60 2012 MAS Aug 0155 2350 61 2012 MAS Oct 0155 2350 62 2012 MAS Oct 0155 2350 63 2012 MAS Dec 0155 2350 64 2012 MAS Dec 0155 2350 65 TO 2013 MAS Jan 0155 2350 67 2013 MAS Apr 0155 2350 68 2013 MAS Apr 0155 2350 71 2013 MAS Apr 0155 2350 71 2013 MAS Aug 0155 2350					
56 2012 MAS Apr 0155 2350 2350 257 2012 MAS May 0155 2350 </td <td>54</td> <td>2012</td> <td>MAS</td> <td>Feb</td> <td>0155</td>	54	2012	MAS	Feb	0155
57 2012 MAS May 0155 2350 2350 2350 255 2350	55		MAS	Mar	0155
58 2012 MAS Jun 0155 2350 235	56	2012	MAS	Apr	0155
59 2012 MAS Jul 0155 2350 2350 60 2012 MAS Aug 0155 2350 2350 61 2012 MAS Oct 0155 2350 2350 62 2012 MAS Nov 0155 2350 2350 64 2012 MAS Dec 0155 2350 2350 65 2013 MAS Jan 0155 2350 2350 67 2013 MAS Feb 0155 2350 2350 69 2013 MAS Apr 0165 2350 2350 69 2013 MAS May 0155 2350 2350 70 2013 MAS May 0155 2350 2350 71 2013 MAS Jul 0155 2350 2350 72 2013 MAS Aug 0155 2350 2350	57	2012	MAS	Мау	0155
60 2012 MAS Aug 0155 2350 61 2012 MAS Sep 0155 2350 62 2012 MAS Nov 0165 2350 63 2012 MAS Dec 0155 2350 64 2012 MAS Dec 0155 2350 65 Column Co	58	2012	MAS	Jun	0155
61 2012 MAS Sep 0155 2350 62 2012 MAS Oct 0155 2350 63 2012 MAS Nov 0155 2350 64 2012 MAS Dec 0155 2350 65	59	2012	MAS	Jul	0155
61 2012 MAS Sep 0155 2350 62 2012 MAS Nov 0155 2350 63 2012 MAS Nov 0155 2350 64 2012 MAS Dec 0155 2350 65 Sep 0155 2350 2350 66 2013 MAS Jun 0155 2350 68 2013 MAS Apr 0155 2350 70 2013 MAS Apr 0155 2350 71 2013 MAS Jun 0155 2350 72 2013 MAS Jul 0155 2350 73 2013 MAS Aug 0155 2350 74 2013 MAS Oct 0155 2350 75 2013 MAS Nov 0165 2350 76 2013 MAS Nov 0165 2350 78 2013 MAS Doc 0155 2350 79	60	2012	MAS	Aug	0155
62 2012 MAS Oct 0155 2350 63 2012 MAS Nov 0155 2350 64 2012 MAS Dec 0155 2350 65					
63 2012 MAS Dec 0155 64 2012 MAS Dec 0155 65	62				0155
64 2012 MAS Dec 0155 2350 65 Col 3 MAS Jan 0155 2350 67 2013 MAS Feb 0155 2350 68 2013 MAS Mar 0165 2350 69 2013 MAS Apr 0155 2350 70 2013 MAS May 0155 2350 71 2013 MAS Jul 0155 2350 72 2013 MAS Aug 0155 2350 73 2013 MAS Aug 0155 2350 74 2013 MAS Sep 0155 2350 75 2013 MAS Nov 0155 2350 76 2013 MAS Nov 0155 2350 77 2013 MAS Nov 0155 2350 79 2014 MAS Jan 0155 2350<					
65					
66 2013 MAS Jan 0155 2350 <td< td=""><td></td><td></td><td></td><td></td><td></td></td<>					
67 2013 MAS Feb 0155 2350 68 2013 MAS Mar 0155 69 2013 MAS Apr 0155 70 2013 MAS MAS May 0155 71 2013 MAS Jun 0155 72 2013 MAS Jul 0155 73 2013 MAS Aug 0155 74 2013 MAS Sep 0155 75 2013 MAS Oct 0155 76 2013 MAS Nov 0155 77 2013 MAS Nov 0155 78 79 2014 MAS Jan 0155 80 2014 MAS Feb 0155		2013	MAS	Jan	0155
68 2013 MAS Mar 0155 2350 69 2013 MAS Apr 0155 2360 70 2013 MAS May 0155 2350 71 2013 MAS Jun 0155 2350 72 2013 MAS Jul 0155 2350 73 2013 MAS Aug 0155 2350 74 2013 MAS Sep 0165 2350 75 2013 MAS Nov 0155 2350 76 2013 MAS Nov 0155 2350 77 2013 MAS Dec 0165 2350 79 2014 MAS Jan 0155 2350 80 2014 MAS Feb 0155 2350					
69 2013 MAS Apr 0155 2350 70 2013 MAS May 0155 2350 71 2013 MAS Jun 0155 2350 72 2013 MAS Jul 0155 2350 73 2013 MAS Aug 0155 2350 74 2013 MAS Sep 0155 2350 75 2013 MAS Oct 0155 2350 76 2013 MAS Nov 0155 2350 77 2013 MAS Dec 0165 2350 78 79 2014 MAS Jan 0155 2350 80 2014 MAS Feb 0155 2350					ann fra a consumer consumer supplier
70 2013 MAS May 0155 2350 71 2013 MAS Jun 0155 2350 72 2013 MAS Jul 0155 2350 73 2013 MAS Aug 0155 2350 74 2013 MAS Sep 0155 2350 75 2013 MAS Oct 0155 2350 76 2013 MAS Nov 0155 2350 77 2013 MAS Dec 0155 2350 78 79 2014 MAS Jan 0155 2350 80 2014 MAS Feb 0155 2350					
71 2013 MAS Jun 0155 2350 72 2013 MAS Jul 0155 2350 73 2013 MAS Aug 0155 2350 74 2013 MAS Sep 0155 2350 75 2013 MAS Oct 0155 2350 76 2013 MAS Nov 0155 2350 77 2013 MAS Dec 0155 2350 78 79 2014 MAS Jan 0155 2350 80 2014 MAS Feb 0155 2350					- Conservation and the contract the
72 2013 MAS Jul 0155 2350 73 2013 MAS Aug 0155 2350 74 2013 MAS Sep 0155 2350 75 2013 MAS Oct 0155 2350 76 2013 MAS Nov 0155 2350 77 2013 MAS Dec 0155 2350 78 79 2014 MAS Jan 0155 2350 80 2014 MAS Feb 0155 2350					
73 2013 MAS Aug 0155 2350 74 2013 MAS Sep 0165 2350 75 2013 MAS Oct 0155 2350 76 2013 MAS Nov 0155 2350 77 2013 MAS Dec 0155 78 79 2014 MAS Jan 0155 2350 80 2014 MAS Feb 0165					
74 2013 MAS Sep 0155 2350 75 2013 MAS Oct 0155 2350 76 2013 MAS Nov 0155 2350 77 2013 MAS Dec 0165 2350 78 79 2014 MAS Jan 0155 2350 80 2014 MAS Feb 0155 2350					
75 2013 MAS Oct 0155 2350 76 2013 MAS Nov 0155 2350 77 2013 MAS Dec 0155 2350 78 79 2014 MAS Jan 0155 2350 80 2014 MAS Feb 0155 2350					and a contract of the contract
76 2013 MAS Nov 0155 2350 77 2013 MAS Dec 0155 2350 78 79 2014 MAS Jan 0155 2350 80 2014 MAS Feb 0155 2350					inotararanananananananana
77 2013 MAS Dec 0155 2350 78					
78					
79 2014 MAS Jan 0155 2350 80 2014 MAS Feb 0155 2350		2013	MAS	Dec	0155
80 2014 MAS Feb 0155 2350 2350					
					······································
81 2014 Acumen Mar 0155 2350 2350					
	81	2014	Acumen	Mar	0155

Case 3:16-cv-00695-FDW-DCK CONCUMENTAT9-8 Filed 10/23/18 PSRIPE-03:914

		System	Month			ra (e) Imio		£==-	HC Units HC N BO Units	
82	2014	Acumen	Apr	0155			762	2350		
83	2014	Acumen	May	0155			FULL A	2350		
84	2014	Acumen	Jun	0155				2350		
85	2014	Acumen	Jul	0155	Section 1	SATE SEASON		2350		
86	2014	Acumen	Aug	0155			200200	2350	建筑 建氯	
87	2014	Acumen	Sep	0155				2350		第二次社员
88	2014	Acumen	Oct	0155				2350		
89	2014	Acumen	Nov	0155			Man	2350		
90								2350		
	2014	Acumen	Dec	0155				2350		
91										
92	2015	Acumen	Jan	0155				2350	SERVE SER	
93	2015	Acumen	Feb	0155				2350		
94	2015	Acumen	Mar	0155			- Table	2350		
95	2015	Acumen	Apr	0155				2350		
96	2015	Acumen	May	0155	Barrier B			2350		
97	2015	Acumen	Jun	0155			7.5	2350		
98	2015	Acumen	Jul	0155			26	2350		
99	2015	Acumen	Aug	0155				2350		
100	2015	Acumen	Sep	0155	1024545			2350	2000年 日本	
101	2015	Acumen	Oct	0155			高快	2350		
102	2015	Acumen	Nov	0155				2350		
103	2015	Acumen	Dec	0155				2350		
104					Name of					E CONSTITUTION
105	2016	Acumen	Jan	0155		17.4	(1)	2350		
106	2016	Acumen	Feb	0155			750	2350		
107	2016	Acumen	Mar	0155				2350	NAME OF STREET	
108	2016	Acumen	Apr	0155			and the	2350		
109	2016	Acumen	May	0155			The state of the s	2350	44.5	
110	2016		Jun	0155	公益200		N. Carlotte	2350		Ser MADMAN
		Acumen			- F		155			
111	2016	Acumen	Jul	0155			20124	2350		
112	2016	Acumen	Aug	0155				2350		
113	2016	Acumen	Sep	0155			N/AL	2350		
114	2016	Acumen	Oct	0155	1.00 (E.S.)		2 72	2350		
115	2016	Acumen	Nov	0155		3X34 = 4X43		2350		
116	2016	Acumen	Dec	0155				2350		
	20.0			2100	10 mm 2		2016	2000		
117	0047		1	0.55	STATE OF			0070		
118	2017	Acumen	Jan	0155			国经营	2350		
119	2017	Acumen	Feb	0155	1022		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2350	医多数	
120	2017	Acumen	Mar	0155			19/5	2350	A3 1	
121	2017	Acumen	Apr	0155				2350		S. William
122	2017	Acumen	May	0155				2350		
123	2017		Jun	0155			T100%	2350		
		Acumen								
124	2017	Acumen	Jul	0155				2350		
125	2017	Acumen	Aug	0155			G183	2350	REAL TOP	
126	2017	Acumen	Sep	0155				2350		
127	2017	Acumen	Oct	0155				2350		
128	2017	Acumen	Nov	0155	2 Van 2			2350		
129	2017	Acumen	Dec	0155				2350		是 医热热器
130	2011	Addition	500	0.00						
					建					
131	2018	Acumen	Jan	0155		海蜇1	STOPPET .	2350		
132	2018	Acumen	Feb	0155				2350		
133	2018	Acumen	Mar	0155				2350	PALKS TEE	
34	2018	Acumen	Apr	0155				2350		K MARKET
35	2018	Acumen	May	0155			the Brook	2350	· · · · · · · · · · · · · · · · · · ·	
36	2018	Acumen	Jun	0155	# W.			2350	(4) (3) (4)	
								2350		
37	2018	Acumen	Jul	0155	3 W 2 - 1		15 (1) to			
38	2018	Acumen	Aug	0155			Chia.	2350		
39	2018	Acumen	Sep	0155	50 FEET		W 435	2350		
40	2018	Acumen	Oct	0155			1000	2350	Jan Bar	
41	2018	Acumen	Nov	0155			6.25	2350		
42	2018	Acumen	Dec	0155				2350		
43				Total		New House		total		